

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BARCO, INC. and BARCO NV,

Plaintiffs,

v.

YEALINK (USA) NETWORK
TECHNOLOGY CO., LTD., and
YEALINK NETWORK
TECHNOLOGY CO., LTD.

Defendants.

Case No. 2:23-CV-00521-JRG-RSP

JURY TRIAL DEMANDED

**DECLARATION OF ERIK J. HALVERSON IN SUPPORT OF RESPONSE TO
DEFENDANTS' *DAUBERT* MOTION TO EXCLUDE OPINIONS OF
WILLIAM B. SCALLY**

I, Erik J. Halverson, hereby declare as follows:

1. I am a partner at the law firm of K&L Gates LLP and counsel for Plaintiffs Barco, Inc. and Barco NV (collectively, "Plaintiffs"). I have personal knowledge of the facts set forth in this Declaration and if called upon as a witness, I could and would testify to such facts under oath.

2. Attached as **Exhibit A** are true and correct excerpts from the April 18, 2025 deposition of [REDACTED].

3. Attached as **Exhibit B** are true and correct excerpts from Defendants' First Supplemental and Amended Responses and Objections to Plaintiffs' Fourth Set of Interrogatories (Nos. 17-19).

4. Attached as **Exhibit C** is a true and correct copy of email correspondence between counsel for the parties, dated March 18, 2025 through May 2, 2025.

5. Attached as **Exhibit D** are true and correct excerpts from the April 25, 2025 deposition of Erwin Six.

6. Attached as **Exhibit E** are true and correct excerpts from the May 23, 2025 deposition of William B. Scally.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on July 1, 2025 in San Francisco, CA.

/s/ Erik J. Halverson
Erik J. Halverson

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document and accompanying Exhibits were filed electronically in compliance with Local Rule CV-5(a) and served via email on all counsel of record on July 1, 2025.

/s/ Erik J. Halverson

CERTIFICATE OF AUTHORIZATION TO SEAL

I hereby certify that pursuant to Local Rule CV-5(a)(7), the foregoing document and accompanying Exhibits were filed under seal pursuant to the Court's Protective Order entered in this matter (Dkt. 30).

/s/ Erik J. Halverson